CULPEPPER IP, LLLC

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UNITED STATES DISTRICT COURT

FOR THE DISTRICT OF HAWAII

In re Subpoena to)	19-mc-332
)	
Cloudflare, Inc.)	

DECLARATION PURSUANT TO 17 U.S.C. 512(h)

KERRY S. CULPEPPER, hereby declares under penalty of law that the following is true and correct:

- 1. I am an attorney licensed to practice law in Hawai'i and represent HB Productions, Inc., the owner of the copyright in the motion picture *Hellboy*.
- 2. This declaration is made in support of the accompanying subpoena, pursuant to 17 USC 512(h)(2)(C).
- 3. The purpose of the accompanying Subpoena is to obtain the identity of the alleged copyright infringer(s), namely the individuals who are infringing the motion picture. The information obtained will be used only for the purpose of protecting the rights granted to the copyright owner(s).

I declare under penalty of perjury that the foregoing is true and correct.

DATED: Kailua-Kona, Hawaii, September 06, 2019.

CULPEPPER IP, LLLC

/s/ Kerry S. Culpepper Kerry S. Culpepper

Attorney for Owner/Requestor